

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE

CASE NO.: SC09-1182

N. JAMES TURNER

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JQC Case No.: 09-01

**RESPONDENT'S RESPONSE**  
**TO THIRD REQUEST FOR PRODUCTION**

Respondent, Judge N. James Turner, by and through his undersigned counsel, pursuant to Rule 12 of the Rules of the Florida Judicial Qualifications Commission and Rule 1.350 of the Florida Rules of Civil Procedure, hereby files his response to the Third Request for Production of the Judicial Qualifications Commission, filed on January 21, 2010, and states as follows:

**REQUEST:**

1. All documents reflecting, referring or relating to all polling or voter surveys conducted for or related to your 2008 campaign for judge or any polling data with respect to your judicial candidacy, including the results of all such polling or voter surveys.

**RESPONSE:**

*Respondent is not in possession of any documents that would be responsive to Item No. 1 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010.*

**REQUEST:**

2. All documents received by you when you registered to run for Circuit Court Judge in the 2008 campaign.

**RESPONSE:**

*Respondent received numerous documents when he registered to Circuit Court Judge including a copy of the Florida Canons of Judicial Ethics and Chapter 105 of the Florida Statutes. Respondent wishes to cooperate fully in discovery and will produce specific documents upon request.*

**REQUEST:**

3. All documents reflecting, referring or relating to the restrictions on judicial candidates under Florida law which you received from the JQC or any other source prior to the 2008 primary election in which you ran as a candidate for circuit court judge.

**RESPONSE:**

*Respondent received numerous documents when he registered to Circuit Court Judge including a copy of the Florida Canons of Judicial Ethics and Chapter 105 of the Florida Statutes. Respondent wishes to cooperate fully in discovery and will produce specific documents upon request.*

**REQUEST:**

4. The text or tapes of all automated phone calls or robocalls made to voters or members of the public on your behalf by Reverend Jermaine T. Bracy or any other person, during your campaign for the judgeship you now hold.

**RESPONSE:**

*Respondent is not in possession of any documents that would be responsive to Item No. 4 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010.*

**REQUEST:**

5. All documents reflecting, referring or relating to the source of the funds (in excess of \$42,000) which you loaned to your 2008 campaign.

**RESPONSE:**

*All documents that would be responsive to Item No. 5 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

6. All documents reflecting, referring or relating to any loans or other monies you personally provided out of your own funds to or for your campaign for the

judgeship you now hold.

**RESPONSE:**

*All documents that would be responsive to Item No. 6 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

7. All documents reflecting, referring or relating to any loans, gifts or other funds received by you, directly or indirectly, from Gertrude Turner and or any member of your family or any other person, that were used, in whole or in part, to fund your 2008 campaign.

**RESPONSE:**

*All documents that would be responsive to Item No. 7 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

8. All documents reflecting, referring or relating to the source, origins or derivation of all or any part of the \$10,000 you loaned your campaign between

October 1, 2007 and December 31, 2007.

**RESPONSE:**

*All documents that would be responsive to Item No. 8 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

9. All documents reflecting, referring or relating to the source, origins or derivation of the \$19,493 you loaned your campaign between April 1, 2008 and July 17, 2008.

**RESPONSE:**

*All documents that would be responsive to Item No. 9 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 have been provided by Bates-stamped .pdf document in Response to Request No. 8 hereof.*

**REQUEST:**

10. All documents reflecting, referring or relating to the source, origin or derivation of the sums you loaned to your campaign between August 2, 2008 and September 26, 2008.

**RESPONSE:**

*All documents that would be responsive to Item No. 9 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 have been provided by Bates-stamped .pdf document in Response to Request No. 8 hereof.*

**REQUEST:**

11. All financial reports filed with the State of Florida, Division of Elections, reflecting all funds raised or borrowed by your 2008 campaign and all expenditures for your 2008 campaign.

**RESPONSE:**

*All documents that would be responsive to Item No. 11 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

12. All documents reflecting, referring or relating to any transactions, dealings or communications between your or your campaign or anyone acting on your or your campaign's behalf and Tim Shea or any other person acting for or on behalf of Tim Shea in any way related to the 2008 election campaign.

**RESPONSE:**

*All documents that would be responsive to Item No. 5 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010 are being provided contemporaneously herewith. It is anticipated that clarification in respect to this area of inquiry will be provided when Judge Turner is deposed.*

**REQUEST:**

13. All contracts and agreements between you or your campaign and any or all of your paid campaign workers related to your 2008 campaign.

**RESPONSE:**

*Respondent is not in possession of any documents that would be responsive to Item No. 13 of the Third Request for Production of Documents to Judge N. James Turner filed on January 21, 2010.*

**REQUEST:**

14. All documents reflecting the paid campaign volunteers who were present or were paid to work at the polls during early voting at the Fila Mitchell Library in Orlando on or about October 20, 2008 or any other early voting day at the aforementioned location.

**RESPONSE:**

*To the extent that they exist, all documents that would be responsive to Item*

*No. 14 of the Third Request for Production of Documents to Judge N. James Turner  
filed on January 21, 2010, have been previously produced in this proceeding.*

Dated this 12th day of April, 2010.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been  
furnished this 12th day of April, 2010, to the persons listed on the Service List.

\_\_\_\_\_/s/\_\_\_\_\_  
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**Service List**

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Lauri Waldman Ross, Esq. 9130 S. Dadeland Blvd. Ste. 1612 Miami, FL 33156	The Honorable John P. Cardillo, Esq. Chairman, Hearing Panel, Florida JQC 3550 Tamiami Trail E. Naples, Florida 34112-4905